

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
CENTRAL DIVISION**

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**VICTOR NAHUM VARGAS,**  
[DOB: 05/04/1978]

Defendant.

No. 18-04066-01-CR-C-BCW

**COUNTS 1-2**

18 U.S.C § 922(d)(1)

NMT 10 Years Imprisonment

NMT \$250,000 Fine

NMT 3 Years Supervised Release

Class C Felony

**COUNT 3**

18 U.S.C § 922(a)(6)

NMT 10 Years Imprisonment

NMT \$250,000 Fine

NMT 3 Years Supervised Release

Class C Felony

\$100 Special Assessment (each Count)

**SUPERSEDING INDICTMENT**

**THE GRAND JURY CHARGES THAT:**

**COUNT 1**

(Knowingly Sold a Firearm to a Felon)

18 U.S.C. § 922(d)(1)

On or about April 18, 2018, within Cole County, in the Western District of Missouri, and elsewhere, the defendant, **VICTOR NAHUM VARGAS**, knowingly sold five (5) firearms to a person, knowing and having reasonable cause to believe, that such person had been convicted of a crime punishable by imprisonment for a term exceeding one year, all in violation of Title 18, United States Code, Sections 922(d)(1), and 924(a)(2).

**COUNT 2**  
(Knowingly Sold a Firearm to a Felon)  
18 U.S.C. § 922(d)(1)

On or about May 11, 2018, within Cole County, in the Western District of Missouri, the defendant, **VICTOR NAHUM VARGAS**, knowingly sold eleven (11) firearms to a person, knowing and having reasonable cause to believe, that such person had been convicted of a crime punishable by imprisonment for a term exceeding one year, all in violation of Title 18, United States Code, Sections 922(d)(1) and 924(a)(2).

**COUNT 3**  
(False Statement to Acquire a Firearm)  
18 U.S.C. § 922(a)(6)

On or about May 9, 2018, in Cole County, in the Western District of Missouri, the defendant, **VICTOR NAHUM VARGAS**, in connection with his acquisition of firearms, that is, a Sig Sauer, Model P266, .40 caliber semi-automatic pistol, serial number UU627309; a Glock, Model 22, .40 caliber semi-automatic pistol, serial number STT684; a Glock, Model 19, .40 caliber semi-automatic pistol, serial number XXF524; a Glock, Model 22, .40 caliber semi-automatic pistol, serial number STT689; a Glock, Model 22, .40 caliber semi-automatic pistol, serial number STT697; a Glock, Model 22, .40 caliber semi-automatic pistol, serial number IM3645PD; a Glock, Model 22, .40 caliber semi-automatic pistol, serial number ZUZ369; a Glock, Model 22, .40 caliber semi-automatic pistol, serial number TCP183; a Glock, Model 21, .45 caliber semi-automatic pistol, serial number KAK165; and a Smith & Wesson, Model M & P 9, 9mm semi-automatic pistol, serial number DWY6987; each from River City Pawn & Gun, a licensed dealer of firearms within the meaning of Chapter 44 of Title 18, United States Code, knowingly made a false and fictitious written statement which was intended and likely to deceive River City Pawn & Gun with respect to a fact material to the lawfulness of the sale of the firearms to the defendant

under Chapter 44 of Title 18, in that the defendant represented on a Bureau of Alcohol, Tobacco and Firearms Form 4473 that he was the actual transferee/buyer of the firearms, when, in fact, he was acquiring each firearm on behalf of another person, all in violation Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

**A TRUE BILL.**

*/S/ Samie Hill*

**FOREPERSON OF THE GRAND JURY**

*/S/ Lawrence E. Miller*

**Lawrence E. Miller**

Assistant United States Attorney

Missouri Bar No. 35931

Dated: 10/24/2018